

**CORRECTED**

**EXHIBIT D**



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December 13, 2022

MICHIGAN STATE UNIVERSITY  
RECEIVED

DEC 16 2022

OFFICE OF THE  
GENERAL COUNSEL

Court of Claims  
Hall of Justice  
925 W. Ottawa St.  
PO Box 30185  
Lansing, MI 48909  
ATTN: Clerk's Office

**RE: Notice of Intent to File Claim**

Dear Clerk:

This is our notice of intent to file a claim against Michigan State University, Michigan State University Board of Trustees, and several individual employees identified below.

Claimant

Crystal Perry is a former MSU Police Department employee who was discriminated against based on her race and sex, retaliated against for reporting the discrimination, and wrongfully terminated.

Potential Adverse Parties

Michigan State University  
Michigan State University Board of Trustees  
Samuel Stanley, Jr.  
John Prush  
Chris Rozman  
Doug Monette  
David Oslund  
Andrea Munford  
Kennedy Parker  
Daryl Green  
Jessica Martin  
Marlon Lynch

Potential Claims

Sex discrimination and retaliation in violation of Title IX of the Educational Amendment Act of 1972, 20 U.S.C. §1681, *et seq.*, against MSU and MSU Board of Trustees;

Race and sex discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.*, against MSU and MSU Board of Trustees;

Equal Protection and Substantive and Procedural Due Process Clause violations, U.S. Const., Amendment XIV, 42 U.S.C. §1983, against all individual defendants;

Race and sex discrimination and retaliation in violation of the Elliott-Larsen Civil Rights Act, MCL §37.2301, *et seq.*, against all defendants;

Breach of contract against MSU, MSU Board of Trustees, and individual defendants Stanley, Lynch, and Green; and

Violations of the Michigan Constitution against all defendants.

#### Factual Basis for Claims

On June 1, 2021 Crystal Perry was offered a job at Michigan State University's Police Department as a Human Resources Administrator II/Supervisor 13. She began her job on July 12, 2021 and her start date was contingent upon a successful background check. Ms. Perry was discriminated against from the first day. Ms. Perry was shown to a closet by Doug Monette that would be her office. There was no office set up and no equipment. She had to clean her own office, order her own supplies, and work from her personal computer and her personal cell phone. Ms. Perry was told by John Prush that he was not going to set up her computer and that he would not be ordering her any equipment. It took weeks of requests for John Prush to come to Ms. Perry's office, but not to help her, only to express his unhappiness for the continued requests. This was only the beginning of the discrimination and retaliation Ms. Perry would suffer while employed with the MSU Police Department. After this, she began documenting the way she was being treated in her place of employment.

On or around August 16, 2021, Kennedy Parker told Crystal Perry that employees in the office were upset that Ms. Perry now had some of their previous duties and responsibilities. Kennedy Parker stated that she personally was upset with Ms. Perry because her duties in the recruitment and hiring process were handed over to Ms. Perry. As a form of intimidation, Kennedy Parker told Ms. Perry to watch her back. This interaction led Ms. Perry to filing an OIE complaint against Kennedy Parker. After filing this complaint, Kennedy Parker retaliated against Ms. Perry by consistently threatening her job by stating that she was a probationary employee, and that leadership should get rid of her. Ms. Perry reported this behavior to Daryl Green on at least two occasions, and he did nothing.

In late August 2021, after Ms. Perry filed an OIE complaint, other employees in the department stated they were going to file a reverse discrimination complaint because they were upset that Ms. Perry was hired as the Human Resources Manager. The other employees alleged that Ms. Perry was only hired based upon her being friends with Chief Lynch, instead of upon her merits. She reported this to Lynch and to Green, nothing was done

and the discrimination continued. On or around September 12, 2021, John Prush told Ms. Perry that he would not set up equipment for new employees, which was part of his job as IT Specialist.

On September 29, 2021, there was a meeting where numerous employees made comments about Ms. Perry on a personal and professional level to undermine her authority. The complaints were baseless but plentiful. John Prush complained about Ms. Perry halting a hiring process he was leading, a process she halted because there were no people of color and diversity on the interviewing panel. Chris Rozman complained about Ms. Perry when she inquired about diversity in the recruiting process for his Communications Manager position. Dave Osland accused Ms. Perry of not following the chain of command for having a Human Resources Diversity Wellness Clinic. These complaints would only grow among her colleagues and worsen as it began to affect her assigned job duties.

On November 8, 2021, Ms. Perry was physically threatened and verbally assaulted by Jessica Martin. This interaction left Ms. Perry feeling incredibly scared and in fear for her physical safety at her job. Following this attack, on November 11, 2021, the same employee went to Ms. Perry's subordinate to handle a hiring procedure instead of Ms. Perry herself.

On or around November 29, 2021, Ms. Perry met with Chief Daryl Green. At this meeting he asked her to sign an additional document. This document was an Authorization for Release of Personal Information form. Ms. Perry was not told why this was necessary, but she signed the document to avoid more conflict and potentially losing her job. She had already undergone a background check to be hired.

In January 2022, Ms. Perry filed an EEOC charge against MSU. This complaint detailed a few of the many instances of discrimination and retaliation she had begun to face. MSU filed a response to Ms. Perry's complaint in March 2022 and claimed that she had never received any kind of disciplinary action or reduction in pay or benefits. They also claimed that Ms. Perry never experienced any material job change of any kind. They failed to acknowledge the very apparent acts of abuse, discrimination, and retaliation she was facing in her place of employment.

Soon after this response, Ms. Perry filed another EEOC charge against MSU. This complaint even further highlighted the discrimination and retaliation she was experiencing, specifically the discrimination Ms. Perry faced at the hands of Kennedy Parker. Kennedy Parker threatened disciplinary actions against Ms. Perry on numerous occasions and she claimed that Ms. Perry was merely a probationary employee. Kennedy Parker retaliated against Ms. Perry by telling Ms. Perry that she was not allowed to make any complaints about her rights being violated or mistreatment she suffered unless she asked for written permission. Kennedy Parker manipulated the policy of Personal Background Investigations and had Ms. Perry sign away her rights for an ongoing investigation against Ms. Perry. Kennedy Parker made it known that if Ms. Perry did not sign this document, her employment would be terminated. Due to Kennedy Parker's harassment and retaliation against Ms. Perry, Chief Green began to micromanage all of Ms. Perry's job duties, including reading, reviewing, and approving all emails before they were sent out.

Starting around April 2022, Ms. Perry began to face additional retaliation in the form of her job duties being significantly reduced. Ms. Perry's staff that had always reported to her was taken away and given the excuse that they were completing special projects for Daryl Green. Additionally, Ms. Perry's office was taken away and she was placed in a shared cubicle space with student employees, while her office was given to a white male employee. On July 8, 2022, Daryl Green terminated Ms. Perry's employment as retaliation for the complaints against him and others with both the EEOC and MSU's Office of Institutional Equity.

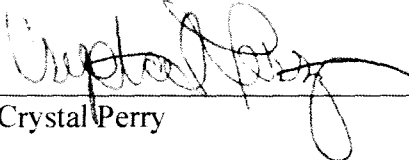
Ms. Perry has faced continuing retaliation even after her termination from MSU. Ms. Perry was denied an interview for a Human Resource Position at the MSU College of Nursing. Ms. Perry applied for the role of Human Resources Administrator at the College of Nursing and on July 11, 2022, she was offered an interview with the search committee for that role. Ms. Perry happily accepted the interview offer on July 11, 2022. On July 12, 2022, Christie Provost-Perkins confirmed Ms. Perry's interview. On July 13, 2022, Andy Gregor emailed Ms. Perry revoking her interview offer. Andy Gregor stated that he was notified by MSU HR that Ms. Perry's application cannot be considered at this time and that he would be canceling her interview scheduled for July 21, 2022.

Ms. Perry has experienced repeated acts of discrimination because of her race and sex, as similarly situated white and/or male employees are not subjected to the same treatment. Her reporting of this discrimination has led to retaliation for raising concerns about discrimination and harassment based on race and sex in the workplace.

As a result of the potential adverse parties' acts and omissions against her, Ms. Perry suffered numerous injuries including but not limited to, severe stress and emotional distress, humiliation, embarrassment, loss of income and benefits. Claimant seeks all available legal and equitable relief available to her, including but not limited to compensatory damages, punitive damages, and attorney fees and costs.

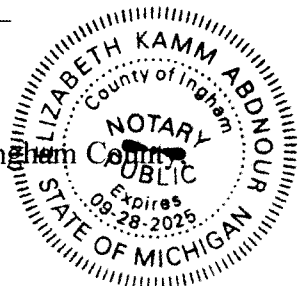
### VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and understanding.

  
\_\_\_\_\_  
Crystal Perry

Subscribed and sworn to before me on December 13, 2022. Commissioned in Ingham County, Michigan, acting in Ingham County. Commission expires 9/28/25.

  
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NOTARY PUBLIC



Court of Claims  
December 13, 2022  
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Respectfully submitted,  
ELIZABETH ABDNOUR LAW, PLLC

A handwritten signature in dark ink, appearing to read 'Elizabeth K. Abdnour', written in a cursive style.

Elizabeth K. Abdnour, Esq.